

**DEPARTMENT OF CHILDREN, YOUTH AND FAMILIES
CHILD WELFARE PROGRAM
FAMILY SERVICES AND BOARD AND CARE
PERFORMANCE AUDIT
FISCAL YEAR ENDED JUNE 30, 1998**

**DEPARTMENT OF ADMINISTRATION
BUREAU OF AUDITS
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STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

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FISCAL YEAR ENDED JUNE 30, 1998

EXECUTIVE SUMMARY

The Department of Children, Youth and Families (DCYF) needs to update their policies and procedures on a department-wide basis to strengthen both program and administrative controls. Management controls over program operations and validity and reliability of data includes policies and procedures that management has implemented to reasonably ensure that programs meet their objectives and are operating properly. Stronger financial management controls related to program operations and the safeguarding and efficient uses of resources are needed in the following areas: payroll, monitoring contract development, fleet vehicles, and equipment inventory.

The new Rhode Island Children's Information System is affecting operations that need to be addressed in both short and long-term planning. Currently, the computer system is not providing essential information for management reporting, planning, and monitoring purposes. Management needs to be able to understand and manage the business risks associated with the implementation of new technology. Adequate controls are essential due to the great dependence the department has placed on this system, as well as current and future costs to maintain the system.

DCYF needs to clarify the role of the Administrative Review Unit, ensure that all case plans are being reviewed, and coordinate the review process with the Family Court System.

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December 6, 1999

Mr. Jay G. Lindgren, Jr., Director
Department of Children, Youth and Families
610 Mount Pleasant Avenue
Providence, RI 02908

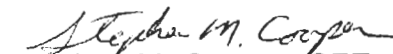
Dear Mr. Lindgren:

We have completed our audit of the Department of Children, Youth and Families--Child Welfare Program, Family Services and Board and Care for the fiscal year ended June 30, 1998. Our audit was conducted in accordance with Sections 35-7-3 and 35-7-4 of the Rhode Island General Laws.

The findings and recommendations included herein have been discussed with management and we have considered their comments in the preparation of our report. Management's responses to our audit recommendations have also been included in our report.

In accordance with Section 35-7-4 of the General Laws we will review the status of the Department of Children, Youth and Families--Child Welfare Program, Family Services and Board and Care corrective action plan within six months from the date of issue of this report.

Sincerely,


Stephen M. Cooper, CFE, CGFM
Chief, Bureau of Audits

SMC(SME):pb

DEPARTMENT OF CHILDREN, YOUTH AND FAMILIES
CHILD WELFARE PROGRAM
FAMILY SERVICES AND BOARD AND CARE
PERFORMANCE AUDIT
FISCAL YEAR ENDED JUNE 30, 1998

INTRODUCTION

Objectives, Scope, and Methodology

We conducted a performance audit of the Department of Children, Youth and Families for the fiscal year ended June 30, 1998. The scope of our audit was limited to the Family Services and Board and Care Programs. These two programs represented approximately \$54.8 million or 54 percent of the total expenditures for the Child Welfare Program. Our objectives were to determine if the programs complied with laws and regulations and were acquiring, protecting, and using resources economically and efficiently.

Our audit was made in accordance with the *Standards for the Professional Practice of Internal Auditing* issued by the Institute of Internal Auditors and included such tests of the accounting records and such auditing procedures as we considered necessary in the circumstances.

We evaluated the internal control structure of the Family Services and Board and Care Programs and reviewed the procedures used for case management, case plans, case plan reviews, and operating procedures for provider contracts, personnel, and various administrative procedures as they applied to the programs. The formulation of the findings and recommendations included in this report were based on our:

- Review and analysis of state laws, regulations, policies and procedures; and
- Interviews with personnel and tests for compliance with applicable laws, regulations, and procedures.

The findings and recommendations included herein have been discussed with management, and we have considered their comments in the preparation of our report. Section 35-7-4 (c) of the Rhode Island General Laws requires the auditee to respond within 60 days to all recommendations in this report. Management's response to our audit findings and recommendations are included in our report.

Background

Title 42, Chapter 72 of the Rhode Island General Laws defines the functions of the Department of Children, Youth and Families. The department is the state agency with the primary responsibility to mobilize the human, physical, and financial resources available to plan, develop, implement, and evaluate a comprehensive and integrated statewide program of services designed to ensure the opportunity for children to reach their full potential. The Child Welfare program within the department consists of several major subprograms including Family Services and Board and Care.

Family Service unit social workers provide services directly or by coordinating purchased services for both children and their caretakers. These services may be contracted services such as counseling or education in an effort to keep children at home or if the child must be removed from the home and various levels of residential care.

Board and Care payments are made to providers for various types of services through contracts and purchased service placements.

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STATUS OF PRIOR AUDIT RECOMMENDATIONS

Our evaluation of prior audit recommendations of Central Management dated August 8, 1995 was limited to significant issues affecting the operations of the Family Services and Board and Care subprograms included in the Child Welfare Program.

Policy and Procedure Manual

1. DCYF should develop and update a master policy and procedure manual.

Not implemented. See current year recommendation 1.

Counseling

2. Establish a criteria for utilization and quality review.

Partially implemented. See current year recommendation 4.

Respite, Day Care and Babysitting

3. Develop and implement a respite care fee schedule which pegs the rate to required skill level.

Not implemented. See current year recommendation 10.

SSA and SSI Medical Benefits

4. Report account balances timely to ensure that the children benefit.

Not implemented. See current year recommendation 15.

Parental Support Program

5. Develop procedure for processing petitions for parental support.

Not implemented. See current year recommendation 14.

Request for Special Employment (A-64 Payroll)

6. Reserve use of the Special Request for Employment to emergency situations.

Not implemented. See current year recommendation 19.

Inventory

7. Conduct a physical inventory annually.

Not implemented. See current year recommendation 21.

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FINDINGS AND RECOMMENDATIONS

Policies and Procedures

Written policies and procedures that are known by all employees are an integral part of controls over program operations. The effectiveness of management to ensure that program goals designed to meet the provisions of the law governing the Department of Children, Youth and Families (DCYF) is significantly reduced when policies and procedures are incomplete or inadequate. DCYF has a policies and procedures manual; however, it is incomplete and out of date. Revisions are not incorporated in a master policy manual but are fragmented throughout the department. This was brought to the attention of DCYF in our audit report dated August 8, 1995. Management acknowledges the need to update the policies and procedures and has created the position of Chief of Practice Standards to work on updating and keeping current the policies and procedures manual. The timeliness of establishing a comprehensive policies and procedures manual is essential for the efficiency and effectiveness of operations.

Recommendation

1. DCYF should continue to update policies and procedures.

Rhode Island Children's Information System (RICHIST)

DCYF stated that they began using the RICHIST computer system in September of 1997 and are still in the process of implementing various aspects of the system department-wide. We noted a number of issues related to the computer system affecting operations that need to be addressed in both short and long-term planning. Management needs to ensure that the information from the system will meet its overall objectives. The system is not currently providing essential information for management control including: planning, monitoring, and reporting. DCYF is aware of the issues and

is in the process of resolving them. Adequate controls are essential due to the great dependence and expectations the department has placed on the system and the information it actually provides. Management needs to be able to understand and mitigate the business risks associated with the implementation of new technologies and the current and future costs to maintain the system. The use of generally applicable and accepted standards for security and control practices for information technology would be helpful to DCYF. Examples of standards that have been developed are those by the Information Systems Audit and Control Foundation (ISACF). They have developed generally applicable and accepted information technology standards for Control Objectives for Information and Related Technology (COBIT) which can help balance risk and control investments.

Recommendation

2. DCYF should explore the feasibility of utilizing generally accepted standards for security and control practices for information technology.

Case Plan Reviews

RIGL 42-72-10(a) requires the department to prepare a written service plan for care and treatment for each child under its supervision. The plan is to be reviewed at least every six months to evaluate if it is in the best interest of the child and is cost effective. The Administrative Review Unit (ARU) of DCYF performs this process. In 1992, DCYF and the R.I. Family Court initiated a project within Providence County that would allow the ARU review and a Court Dispositional Hearing to substitute for each other provided these reviews were six months apart. The intent of the project was to reduce the number of reviews at Providence County only. The other counties are not affected and continue to have cases reviewed every six months by ARU regardless of court hearings. If they perform the reviews no less than every six months, the federal government will reimburse the state for part of the cost. We attempted to determine if they were reviewing all case plans according to the policy and in a timely manner but were unable to do so because of the weaknesses in the following management controls:

- There are no clear consistent policies for case plan reviews;
- There is a lack of coordination between the Family Services Unit and the ARU; and

- ARU or Family services are not fully using the RICHIST computer system for the review process.

An element of ensuring cost effectiveness would be to develop a utilization and quality review facility. These types of reviews are very important tools for ensuring that service plans are effectively evaluated and the cost effectiveness is measured. DCYF informed us that they have done some projects related to utilization review, but there was no formalized effort. To have good management controls and ensure that state and federal requirements are met, an effective case plan review process is essential.

Recommendations

3. DCYF should coordinate the feasibility of continuing the pilot program with the Family Court system.
4. DCYF Management should clarify ARU's role in supporting the Family Services Unit. ARU's role and a utilization and quality review facility should be defined, and policies and procedures should be updated.
5. DCYF should develop controls to ensure that the entire population of case plans is being reviewed and documented in case files.
6. Consideration should be given to conducting reviews at the various regions or local courts and developing procedures that meet the needs of all parties and that there is consistent application of policy in all regions.

Case Management

In accordance with RIGL 42-72-4 (15) the department is to provide for a case management information system and client service plan. To ensure compliance with the statute, the department issued DCYF policy 700.0025 Case Plan/Agreement. The policy requires Case Plan/Agreements to be completed by the assigned Family Services worker within 30 days and subsequent plans being completed at least every 6 months.

We sampled 72 of 4,863 open cases obtained from four Family Services regional directors to determine if they managed the cases in accordance with the applicable laws and procedures. Our review disclosed:

- 12 cases should have been closed but were being carried as active;
- 6 cases did not have current case plans;
- 12 cases had unsigned case plan agreements, and 5 of those were not dated; and
- caseload status reports which are used to accumulate monthly data from the four Family Service regions are being generated manually since the information from the RICHIST system is not reliable. The last report was three months behind the current period.

Presently the case management function involves the use of a combination of the RICHIST and manual systems. As a result, it was necessary for us to review both systems. Using dual systems appears to have weakened controls over monitoring, coordinating, and closing cases. It has contributed to the difficulty of accumulating reliable and relevant information for internal reports. Controls are needed to ensure cases are closed when appropriate, case plans are in effect when required, and the combination of computer records and hard copy data is sufficient to meet departmental legal requirements.

During our interviews it became apparent that many caseworkers and supervisors were having difficulty using the RICHIST system. This may be caused in part by system problems and inadequate training. This situation affects the economy and efficiency of caseworkers and supervisors.

Management has issued interim procedural guidelines for RICHIST use and authorized partial use of the system. Their plans are to require additional parts of the system relating to case plans to be used with the release of system upgrades in 1999.

Recommendations

7. Management should ensure that interim procedures include controls over data validity and reliability.
8. DCYF should consider increasing training for caseworkers.
9. Management should set a target date for full implementation of the RICHIST system.

Contract Development and Monitoring

Vendor contract development and rate setting is done primarily by program staff. While some guidelines and standards including performance measures are now being

used, there does not appear to be sufficient financial expertise and control as part of this process. The only monitoring done by the financial staff is to calculate occupancy rate adjustments and make recoveries based on the actual census data for some providers per the contract requirements. The Chief of Development, Contracts and Standards can waive the recoveries based primarily on program considerations. Purchase of service invoices are being processed without a census. The contracts require that providers submit audit reports performed by certified public accountants thirty days after the end of each program fiscal year. If the provider has more than one program, they must submit worksheets with the audit report providing additional expenditure information related to the provider's budget. Although the DCYF financial office has developed an audit review checklist, no one is tracking what audits are submitted or reviewing those reports that they have received.

An essential element to contract development is setting rate schedules. During our review of the standard contract, we noted that DCYF has established rates for respite care but the rates do not differentiate among the various skill levels. Contracts for respite care should be based on a fee schedule which pegs the rate to a required skill level, (i.e. custodial or skilled).

Recommendations

10. Financial managers should be directly involved in the contract development process. This should include respite care rate setting based on skill levels.
11. DCYF should ensure providers submit audit reports and work sheets and review them for compliance.
12. Payments for purchase of service should be reviewed based on a census before payment.

Board and Care Licensing

In accordance with RIGL 42-72-5 (7), the department is responsible for the licensing of residential facilities providing board and care for children in the various programs administered by DCYF. The providers enter into contracts with DCYF and are subsequently licensed. We were advised by management that there is no overall list of licensed providers; however the RICHIST system includes the active licensees or

license history. We reviewed a total population of 65 contracts and noted that some providers had more than one contract for services. We randomly selected 14 providers to ensure they were on the system, and if the worker in the field could make a determination at that point of entry that they licensed a program. Seven providers had licenses and the remaining seven did not appear on the RICHIST system. There is the possibility that the entities are licensed and that the license is off the system. It appears that the worker in the field cannot rely on the RICHIST system. Family service placements should be supported by a reliable licensure tracking system for state licensed facilities.

Recommendation

13. DCYF should maintain an up-to-date list of licensed providers.

Offset to Cost of Care

During our review, we noted that parental support and federal programs, such as social security and veterans benefits, are used to offset the cost of care to the state for the support of children.

RIGL 15-9-1 places the duty of parents to pay for the support and maintenance to the agency or person having custody of a child. In our 1995 audit report we recommended that DCYF develop procedures for processing petitions for parental support. Our review disclosed that DCYF had drafted a policy in 1996 to comply with the law; however, we were unable to determine if the document was finalized or what the department has done to ensure compliance with the statute.

The department receives benefit checks for children in their custody from various federal programs that can be used to offset the cost of care for the child. The department maintains and monitors the record of each child's balance in trust accounts to ensure it does not exceed the limits of the respective program. Excessive account balances would result in the child being ineligible for certain programs. We were unable to review the trust accounts because DCYF is currently reorganizing the trust account process. There have been problems with a backlog of cases and reimbursement issues including several aspects of the computer system that have not been working properly.

Recommendations

14. DCYF should use the various federal benefits and parental support programs to offset the cost of care.
15. Develop and implement policies and procedures to ensure timely reporting to the various program sponsors.

Time and Effort Reporting

Our review of time and effort reporting procedures disclosed weaknesses in controls related to overtime authorization and processing of time sheets. When an employee requests overtime, they submit a Request for Overtime Authorization Form, DCYF #046 to the supervisor and regional director for approval. The form clearly states that "the form must be attached to time sheet or overtime will not be paid." The approved form is returned to the employee rather than submitted to the payroll office. As a result, we were unable to compare the overtime reported on the time and effort reports to the requests for overtime forms.

Time and effort sheets are submitted to the payroll office and include estimated overtime hours. Each Monday, the workers call the office to report the actual hours worked. During our review we noted many instances where the category "sick/vacation etc" and number of hours reported was being charged for various reasons on the "amended" time sheets.

The lack of clarity in the policy of allowing estimated hours to be placed on the time sheets and then adjusting the category or number of hours to actual can create confusing situations for the payroll office. The payroll office is forced to interpret if the amended hours are in addition to overtime hours worked, or submitted in place of hours worked that day for all hours worked that week. The foregoing interpretations are done with limited information since the requests for overtime are not submitted with the time sheets to the payroll office contrary to department policy.

Recommendations

16. Management should implement adequate controls over time and effort reporting that would include supervisors scheduling overtime. The Request for Overtime Authorization Form should be incorporated as part of the payroll records.
17. Review the policy and practice of amending time sheets.

Request for Overtime Authorization Form

DCYF Policy 113 requires a Request for Overtime Authorization Form be used when overtime is necessary. Our review of the form disclosed that in addition to being part of the review process of payrolls, the Request for Overtime Authorization Form could provide management with information for planning and managing resources as well as measuring the effectiveness of the four family service regions. There is a check off box for the worker to indicate the reason for the overtime and one to indicate if the work could be delegated to a lower class of position. The form has the management information by which overtime can be evaluated and monitored; however, it is not collected and analyzed for quality control and future manpower planning. Analysis of this information would provide the necessary information to make decisions that would improve economy and efficiency.

Recommendation

18. Management should develop procedures to analyze information from these forms and create reports that could assist in planning, evaluating, and monitoring overtime.

Request for Special Employment (A-64 Payroll)

The Request for Special Employment is a mechanism that allows state employees from one department to render services, outside their regular work schedule, to another department when it is in the best interest of the state. A fair interpretation of the best interest of the state would be providing quality service at the least possible cost to the state. During our review we noted that DCYF had hired on a Special Employment (A-64) an employee of another department to process their payroll. This employee has been working on an A-64 payroll for more than a year at the overtime rate of \$27.00 per hour for 10 to 20 hours per week. The Special Employment hours should not be considered overtime. To ensure the state is obtaining services at the least possible cost, the rate per hour should be based on the skill level needed to perform the services.

Recommendation

19. Limit the use of the Request for Special Employment to emergencies, and the reimbursement rates should be comparable to the skill level needed to perform a service.

State Fleet Operations

Each state agency head is accountable for ensuring the efficient use of state vehicles consistent with their mission. Responsibility for the vehicles used by DCYF lies with the supervisors of the various regions. DCYF vehicles are used primarily to transport clients. Our review disclosed there is no overall policy in place for the monitoring and operation of DCYF's vehicles. It is unclear as to what direction they have received from management regarding maintenance schedules, usage, and reporting requirements. This lack of control and monitoring of a fleet of this size and used in many instances for the transporting of children could potentially affect such areas as budgeting, cost of operations, and safety issues. We also determined that information required by Section A-51 of the Department of Administration's Procedural Handbook regarding the filing of forms to determine taxable fringe benefits information is not being properly submitted.

Recommendation

20. Ensure compliance with Section A-51 of the State Procedural Handbook.

Equipment Inventory

Section E-11 of the State's Procedural Handbook requires all departments and agencies to perform a physical inventory annually and maintain a record of all removable equipment. During our review of the records available, we noted that only computer equipment is inventoried, the records are incomplete, and annual physical inventories are not taken. The lack of control over equipment reduces the ability of the agency to safeguard assets and may cause the inefficient use of available equipment.

Recommendation

21. Ensure compliance with Section E-11 of the State Procedural Manual.

**Department of Children, Youth & Families
Child Welfare Program
Family Services and Board and Care
Performance Audit
Fiscal Year Ended June 30, 1998**

RESPONSE to THE BUREAU OF AUDITS RECOMMENDATIONS

No.	Response
1.	<i>Agree:</i> We agree that it is essential to have a comprehensive policy and procedures manual to ensure effective and efficient operations. The Office of Practice Standards has been operating for one year with two staff who are responsible to coordinate a focused, centralized approach to the development and implementation of policy and practice standards. Within the next 18 to 36 months, they will continue to work to update existing policies and procedures and to develop additional needed protocols to ensure that our promulgated policies and procedures reflect changes in state and federal law over the past several years, current knowledge on best practices, and changes in the Department's data gathering and information management system. Our initial efforts have been and will continue to be for the next 18 months focused on the areas of policy which have undergone significant legislative change in the past several years, most significantly the changes to federal and state law relating to the Adoption and Safe Families Act of 1997. We plan to eventually review and update each existing on-line and hard copy policy, procedure and form.
2.	<i>Agree:</i> MIS will incorporate a requirement for periodic reviews of general application controls in their procedures and will review the COBIT Survey for components of said review.
3.	<i>Agree (see no. 4):</i> The pilot project has proved to be unsuccessful in cutting down on reviews; therefore the project will be discontinued. This is partly due to scheduling problems with the Court and various attorneys (CASA, DCYF, defense), but also due to the fact that if the outcome of a hearing proves to be undesirable to any of the parties, any one of the parties could bring the issue back to Court again.
4.	<i>Agree:</i> A workgroup consisting of employees representing sections across the Department is engaged in an effort to define the role of ARU and to structure the delivery of these support services in a way that is viewed by FSU workers as user-friendly and constructive. Over the next twelve months the recommendation of the workgroup will be reviewed by management and policies and procedures will be updated to reflect those recommendations which are implemented.
5.	<i>Agree:</i> It is the obligation of the ARU to check that an active case plan exists for every child in care for more than 30 days. A periodic verification schedule will be prepared wherein the Regional Directors will review all of their cases for compliance and record their review in the case record.
6.	<i>Agree:</i> Refer to Response #4. Many reviews are currently being conducted in the various regional offices. It is anticipated that the workgroup referenced in Response #4 will recommend continued centralized management of ARU functions but physical relocation of ARU staff to regional offices.

No.	Response
7.	<i>Agree (completed):</i> Validity checks have been built into the SACWIS system to prevent users from entering invalid data. Many of the data problems in SACWIS stem from the conversion efforts during implementation. The MIS Unit has been working since then to identify these problems and assist line staff in correcting the data. Subsequent to the Bureau's on-site visit, the SACWIS system has been completed (see no. 9 below).
8.	<i>Agree:</i> A significant number of training sessions have been made available to line staff. Additional computer labs have been set up at the Friendship Street office and at the RITS. Many training sessions are now conducted in the regional offices in order to be more accommodating to social workers' schedules.
9.	<i>Agree (completed):</i> Upon implementation of SACWIS, an interim policy was issued that identified specific areas of work that needed to be completed by staff. This policy was issued because of specific problem areas in SACWIS, i.e., Case Activity Notes and Case Plans. These two areas of SACWIS were redesigned and released into production in January 1999. After this release, the Department issued a new policy that all areas of SACWIS were to be utilized. Therefore, the Department has fully implemented the SACWIS system.
10.	<i>Partially Agree:</i> We believe that the recent restructuring of the contracting process provides for sufficient involvement of financial managers. Specifically, Contracting Staff consult with financial managers before any significant changes to existing contracts are made. In addition, they are involved in all key decisions concerning new contracts. Also, every contract requires written approval of Management and Budget senior staff before it is ultimately executed by the Director. This approval process involves detail review of the program budget and verification that the total amount of the contract agrees with the enacted budgeted work program.
	Respite care referrals may only be made to individual respite care providers or specialized respite care agencies which satisfy established qualifications for the two referenced categories of providers. Rates are tied to the level of care and the degree of difficulty of care for the individual child as reflected in the established foster board rate for the child. See DCYF Staff Gram dated January 14, 1997 and attachment thereto.
11.	<i>Agree:</i> Although the receipt of audit reports from providers was being tracked on a spreadsheet, and non-respondents were being dunned, compliance review was not being performed. Staff has now been dedicated to begin a regular review of audit reports received.
12.	<i>Agree (completed):</i> Payments to POS payroll are made based on invoices submitted as well as the dollar amounts agreed to in the related contracts; census reports are reviewed in conjunction with the invoices.
13.	<i>Agree:</i> The DCYF Licensing Administrator does maintain an up-to-date list of licensed providers. However, SACWIS may not necessarily reflect the same information. This may be a product of the fact that entry of licensing status of residential providers into SACWIS has been the responsibility of numerous individual staff persons spread over two divisions. This will be remedied by the recent vesting of licensing responsibilities for residential programs in a single individual assigned to the Licensing Section.

No.	Response
14.	<i>Agree:</i> As noted in the audit report the Department drafted policies and procedures for processing petitions for parental support. These procedures were manual in nature and imposed substantial requirements on line social workers. As the policies and procedures were finalized in August of 1997 the roll-out of the SACWIS system which itself presented many new challenges to social workers had recently commenced. Consequently a decision was made to delay implementation of parental support efforts. We have subsequently determined that the parental support processes must be automated and have developed a comprehensive work plan for system development and staff training that calls for DCYF referrals to the Child Support Enforcement Agency to commence on or about 8/1/2000.
15.	<i>Agree:</i> Since the time of the audit, policy and procedural changes have been made to ensure that the balances in each child's trust account are monitored on a regular basis. When balances exceed agreed-to levels the assigned social worker is contacted and a plan is developed to spend the balance for the child's benefit.
16.	<i>Agree:</i> Although Departmental operations do not always permit supervisors to schedule overtime in advance, the Chief, Human Resources will review current practices relating to overtime authorization and the processing of time sheets and will develop procedures to ensure that reported overtime was, in fact, authorized and worked and to create systems to evaluate and monitor overtime appropriateness.
17.	<i>Agree:</i> See response to Recommendation #16.
18.	<i>Agree:</i> See response to Recommendation #16.
19.	<i>Disagree:</i> The employee of another department who processes payroll adjustments for this Department works on an as-needed basis between 10 to 20 hours per week. If that employee were not available the Department would not have the capacity to process payroll adjustments in a timely fashion. The employee would not be available at less than the overtime. This is more cost effective than adding a full-time equivalent to do this work as the required amount of work varies from week to week.
20.	<i>Agree:</i> The Executive director for Administration will identify and implement steps necessary to ensure compliance with Section A-51 of the State Procedural Handbook not later than 6/30/2000.
21.	<i>Agree:</i> The Executive director for Administration will identify and implement steps necessary to ensure compliance with Section A-51 of the State Procedural Handbook not later than 6/30/2000.